

CALFED Bay-Delta Program

Preliminary 2001

Environmental Justice Annual Plan

This preliminary workplan was developed with the explicit recognition that, in the absence of the more comprehensive Environmental Justice Strategy described in the attached Environmental Justice Workplan, there are still a number of critical interim actions that can and should be taken this year. The CALFED agencies and environmental justice community representatives who worked together to develop this preliminary plan fully expect it to remain a work-in-progress. While current environmental justice issues are highlighted and several actions to address those issues are outlined in this preliminary plan, the agencies recognize that new issues will surface and innovative tools will need to be developed over the course of the next year. It is important that this work plan be viewed as a first step that will continue to be refined regularly and collaboratively by the CALFED Program and agencies, the Environmental Justice Workgroup, and other environmental justice and community stakeholders.

Elements of the Workplan

The CALFED agencies recognize that effective consideration and integration of environmental justice issues in overall program implementation will require both broad-based actions at the programmatic level (i.e., program-wide) and targeted measures in each program area (e.g., water quality, transfers, water use efficiency). The following sections attempt to:

- propose measures that can be taken at the programmatic level to address existing environmental justice concerns;
- define a rigorous process for full and active public participation in the CALFED program by environmental justice and community stakeholders
- outline some of the current environmental justice issues and concerns associated with implementation of the CALFED program during 2001;
- identify upcoming milestones and implementation actions in each program area that are likely to be taken in 2001; and
- outline a process and identify appropriate forums for ensuring the effective participation of those populations potentially adversely impacted by those actions

Cross-Program Provisions

A. Public Participation

A primary purpose of this workplan is to define a rigorous process for full and active public participation in the CALFED program by environmental justice and community stakeholders. Many of the targeted strategies for ensuring that

participation are outlined below in the program-specific sections. However, it is also important to reiterate the need for an overall framework for broad public participation on environmental justice issues across all CALFED programs.

As outlined in the Implementation Memorandum of Understanding, the CALFED agencies are working to encourage public participation in the design, implementation and evaluation of the CALFED program. Forums for that public involvement generally include advisory committees and workgroups, public meetings and workshops. Most notably, consistent with the Federal Advisory Committee Act (FACA), the CALFED program proposes public involvement through three levels of advisory groups, each of which could serve as a useful forum for consideration of environmental justice issues:

- a broad public advisory committee;
- program area workgroups; and
- local and regional workgroups

1. Broad Public Advisory Committee. The Bay-Delta Advisory Council (BDAC) currently serves as the public advisory group for the CALFED Program. On that body, two seats are currently held by representatives of the Environmental Justice Steering Committee.

At some point in the near future, BDAC will likely sunset and be replaced by a newly-chartered FACA group. That advisory group will play a key role in:

- providing advice on priorities, long-term plans, CALFED Program performance, balance and integration
- acting as a liaison between public work groups, subcommittees and the Policy Group
- establishing subcommittees and work groups, as needed; and
- considering recommendations from subcommittees and local work groups

The new FACA charter will also reaffirm the need for participation by environmental justice representatives. Active participation by environmental justice representatives will help to ensure integration and consideration of these issues and concerns across all elements of CALFED program implementation.

2. Program Area Workgroups. Program area workgroups play a key role in advising CALFED on program implementation and providing specialized technical or policy expertise for specific programs. These FACA subcommittees also often play a key role in developing a project solicitation process or directing funds to specific priority areas. Membership typically includes individuals with technical/policy expertise pertinent to the program area, such as ecosystem

restoration and drinking water quality experts, from non-governmental organizations, tribes, water agencies, State and Federal agencies, and the public at-large.

A number of these groups, such as the Delta Drinking Water Council, Ecosystem Roundtable, and Watershed Workgroup, already exist. Other such workgroups will be needed during implementation. Several with an identified need for participation of environmental justice representatives are identified in the program-specific sections below. Most notably, by February 2001, the new broad public advisory committee will convene an Environmental Justice Workgroup to participate in the development of CALFED's long-term Environmental Justice Strategy and in the implementation of this preliminary Annual Plan. The other program area workgroups may draw from the Environmental Justice Workgroup, as well as other members of the public, when seeking to include environmental justice representatives.

3. Local and Regional Workgroups. The Implementation MOU also suggests that the CALFED program and agencies will establish local workgroups, as needed, to provide forums to support community-based outreach. Those workgroups can serve a useful role in providing an open forum for effective communication and interaction between the CALFED program and local governments and citizens, and in providing local insight and advice on program priorities and performance. Such workgroups could represent specific geographic areas (e.g., San Joaquin Valley, Southern California), various watersheds, basins or ecological zones, or individual communities. Membership would likely include local and regional government representatives, local non-governmental organizations, local tribal representatives, and others interested in, or affected by, the CALFED Program. As appropriate, such workgroups with a recognized need for participation by environmental justice representatives have been identified in the program-specific sections below.

4. Ongoing Communication. While the CALFED program's work to date with environmental justice stakeholders has primarily involved communication with members of the Environmental Justice Steering Committee, it also recognizes that the issues and actions outlined in this workplan will likely be of interest to communities throughout the CALFED solution area. As such, by March 2001, CALFED's Environmental Justice Coordinator (see Section D) will convene an Environmental Justice Workgroup to establish an organized forum for regular communication with representatives of the environmental justice community and

to ensure participation in the development of CALFED's long-term Environmental Justice Strategy, implementation of this preliminary Annual Plan, and an ongoing role in the evaluation and development of future annual plans. The Coordinator will work with the Environmental Justice Steering Committee, the Environmental Justice Coalition, program managers, the agencies, and other community stakeholders throughout the state to ensure the inclusion of an appropriate and geographically diverse set of qualified participants.

Clearly, regular communication between stakeholders and program managers will also greatly increase as environmental justice and community stakeholders take a more active role in the program area and local workgroups as envisioned below.

B. Environmental Justice Education Program

The CALFED program and agencies have made a firm commitment in the ROD to addressing environmental justice challenges related to the management of water in the Bay-Delta watershed. While some agencies and program managers have developed an expertise in addressing environmental justice issues, there is also a recognition that a number of agencies and program staff may not currently have the capacity or tools available to undertake this effort.

In an effort to build that staff capacity within the CALFED program and agencies, CALFED will institute an education and training program for CALFED program staff and agencies on environmental justice. The focus of the training should be on providing program managers and implementing agencies with the tools needed to accomplish the environmental justice provisions outlined in this workplan. In addition to this "formal" training, ongoing education for both sides will occur through the continued dialogue between program managers and agencies and community groups and environmental justice stakeholders as outlined throughout this workplan (e.g., at regional workshops to develop goals and objectives, in development of request-for-proposals, on technical panels, in site-specific EIS/R scoping, in program-specific implementation planning).

By February 2001, the CALFED Program, in coordination with appropriate agencies (e.g., USEPA), will establish a process and timeline for conducting this education and training effort across all programs and agencies. The presence of an Environmental Justice Coordinator within the CALFED program will help to ensure that such educational efforts become an ongoing component of long-term

CALFED implementation.

C. Information and Data Collection

1. Data Collection. The CALFED program and agencies have committed in the ROD to implementing an extensive set of actions and studies during Stage 1. Several of those efforts will be conducted for the purpose of gathering baseline information on the feasibility, scientific viability, and environmental effects associated with proposed projects. Such information will allow implementing agencies and policy makers to evaluate program actions and outcomes and guide future decisions.

As outlined below, that future decision-making process will involve consideration of environmental justice issues across all program areas. In order to effectively evaluate the relationship between proposed CALFED projects and potential environmental justice impacts, the agencies must have access to meaningful data and information (including the latest demographic data) about those communities potentially affected. Such information will allow for a more complete and legitimate analysis of both the scope of the impact and the range of potential solutions.

While much of this data already exists within CALFED agencies and other governmental and non-governmental organizations, the CALFED program should play a key role in coordinating the analysis of that data for use by program managers and implementing agencies.

In that regard, by January 2001, the CALFED program or the appropriate agencies will begin to gather additional demographic information (race, ethnicity, income, and employment by industry) by watershed, if possible, within the CALFED solution area. This information will be made accessible to CALFED agencies to assist in the identification of impacts and the evaluation of appropriate measures to address those impacts. Where appropriate, the CALFED program and agencies should work with local communities to collect data (e.g., data on local groundwater quality in farmworker communities) that may be useful in evaluating specific CALFED proposals and actions.

2. Integration with the CALFED Science Program. The CALFED Science Program can play a key role in providing the necessary social science/economic

expertise and evaluation frameworks that will allow program managers and agencies to effectively evaluate and use this demographic data and information that is collected. As such, by February 2001, the Environmental Justice Coordinator will work with the CALFED Science Program to identify an appropriate role for the Science Program in the development of CALFED's Environmental Justice Strategy and Annual Plans.

3. Environmental Documentation. The Final EIS/R includes an environmental justice impact analysis at the programmatic level. The CALFED agencies recognize the need to conduct further evaluations of such impacts at the project-specific level, consistent with both NEPA and CEQA. As site-specific environmental documentation begins to be developed for a myriad of CALFED Stage 1 actions, additional data will be helpful in allowing program and project managers to make a more complete and legitimate analysis of both the scope of the impact and the range of potential solutions.

Specifically, by March 2001, the CALFED Program will initiate work with the program managers and the Environmental Justice Workgroup to develop a standardized process and/or program-wide guidance to ensure that environmental documentation for all CALFED actions (whether implemented by a CALFED agency or with CALFED funds) adequately considers environmental justice impacts. Such guidance should build on existing agency requirements for environmental justice analyses under NEPA and CEQA, as outlined in documents such as the Council on Environmental Quality's 1997 guidance entitled "Environmental Justice: Guidance under the National Environmental Policy Act."

D. Staff and Resources

1. Staffing. By early 2001, the CALFED Program will hire an Environmental Justice Coordinator to integrate efforts across all CALFED programs, ensure that environmental justice issues are being adequately and effectively addressed within each program, and serve as a liaison with the environmental justice coalition. The Coordinator will work with each program manager, implementing agency, and the Environmental Justice Workgroup to coordinate environmental justice actions in each program, and will regularly report back to the Executive Director and the Policy Group (or its successor) on how environmental justice

goals and objectives are being met. Program managers will be responsible for ensuring implementation of the provisions of this plan.

In addition to an Environmental Justice Coordinator within the CALFED Program, each agency has also identified an individual to serve as an environmental justice liaison with the CALFED program. This person will be responsible for working with the Environmental Justice Coordinator and the Environmental Justice Workgroup to ensure that their agency is adequately and appropriately contributing to the implementation of this workplan. Those liaisons are:

U.S. Department of the Interior	Kaylee Allen
U.S. Fish and Wildlife Service	Mike Thabault
U.S. Bureau of Reclamation	Patricia Rivera
U.S. Geological Survey	
U.S. Bureau of Land Management	
U.S. Environmental Protection Agency	Mike Boots
U.S. Army Corps of Engineers	Paul Bowers
Natural Resources Conservation Service	Helen Flach
U.S. Forest Service	
National Marine Fisheries Service	Mike Aceituno
Western Area Power Administration	
California Resources Agency	
California Department of Fish and Game	Perry Herrgesell
California Department of Water Resources	Steve Macauley
California Environmental Protection Agency	
California State Water Resources Control Board	Adrian Perez
California Department of Health Services	
California Department of Food and Agriculture	
The Reclamation Board	Pete Rabbon
California Office of the Attorney General	

In addition, in the program-specific sections below, this workplan identifies responsible parties (i.e., program managers) within each CALFED program area.

2. Funding. For the CALFED program's Year 1 (current year) and Year 2 budgets, an as-yet-undetermined amount of funding will be made available to develop the CALFED Environmental Justice Strategy and implement this

preliminary Annual Plan, in collaboration with environmental justice and community stakeholders. It is recognized that all costs of implementing the provisions of this plan are not currently identified as a separate line item. Instead, some of those costs are embedded within the current operating and implementation budget for each program area.

In addition to those funds, more than \$500 million will be spent during 2001 across all CALFED program areas to implement actions identified in the ROD. Most of those funds will be allocated either by funding projects selected through a project solicitation process or by directing funds to contractors to conduct specific studies and projects. To ensure that near-term funding decisions appropriately and systematically consider potential environmental justice impacts, in January and February 2001, the CALFED Environmental Justice Coordinator will work with those program managers developing 2001 project solicitation proposals (i.e., Water Use Efficiency, Conjunctive Use, Drinking Water Quality, Watersheds, Ecosystem Restoration) and environmental justice and community stakeholders to develop appropriate standardized requirements to be used both in crafting these project solicitations and in establishing proposal evaluation criteria. Once the solicitations have been issued, the program managers will be responsible for working with the Environmental Justice Workgroup to adopt standardized requirements across all program areas for crafting future solicitations and establishing evaluation criteria.

Program-Specific Provisions

A. Ecosystem Restoration

(Responsible Party: Terry Mills, 916/651-6478)

- ***Potential Environmental Justice Issues***
 - Land use changes for ecosystem restoration (e.g., acquisitions, land retirement) may have potential adverse social and economic impacts.
 - Low-income and minority populations consume more fish from the Bay-Delta system when compared to middle- or upper-income people, and therefore are disproportionately affected by health risks posed by fish contamination.

- Changes in in-stream flows associated with certain CALFED actions could potentially change circulation patterns and adversely impact water quality for Bay-Delta localities.
- ***Upcoming Milestones and Implementation Actions***
 - Develop project solicitation proposal for FY 2002 ecosystem restoration/ecosystem water quality projects, including evaluation and selection criteria **(date)**
 - Review proposals from project solicitation **(date)**
 - Select FY 2002 ecosystem restoration projects **(date)**
 - Develop annual implementation plan **(date)**
 - Create GIS maps depicting where potential ERP land use acquisition or land use changes will occur and compare this to recent demographic information. **(date)**
 - In collaboration with affected communities, work with CALFED agencies and the Office of Environmental Health Hazard Assessment, Regional Water Quality Control Boards 2 & 5, and the San Francisco Estuary Institute (Regional Monitoring Program) to inventory existing fish contamination monitoring programs, inventory existing fish consumption advisories, and determine if existing monitoring levels meet the need of environmental justice for disadvantaged communities. If gaps are found, fund additional monitoring, analysis and or outreach, as appropriate. **(date)**
- ***Process and Forums for Ensuring Effective Participation***
 - Project Solicitation Proposal workshops
 - ERP scientific/ technical/geographic proposal review teams and ERP selection panel
 - Ecosystem Roundtable
 - ERP water acquisition advisory group
 - BDAC (or its successor)
 - Upper Yuba River Workgroup
 - Agency Stakeholder Technical Advisory Group for delta ecosystem planning

B. Watershed Program

(Responsible Party: John Lowrie, 916/653-5422)

- ***Potential Environmental Justice Issues***
 - Issues that arise throughout the CALFED program (e.g., drinking water quality, supply reliability, ecosystem restoration) are being addressed in the Watershed Program through the use of a community-based watershed management approach at the local level. This approach can serve to incorporate environmental justice issues in the decision-making and implementation process by focusing on local engagement in watershed groups and ensuring that watershed program actions consider broad community impacts.
- ***Upcoming Milestones and Implementation Actions***
 - Develop 2001 watershed project solicitation proposal, including criteria and priorities sensitive to the particular places and issues of concern to the environmental justice community **(date)**
 - Review proposals from watershed project solicitation **(date)**
 - Select 2001 watershed projects **(date)**
- ***Process and Forums for Ensuring Effective Participation***
 - BDAC's Watershed Workgroup (which currently has, and will continue to encourage, the active participation of community-based interests)
 - Watershed Program proposal review teams and selection panel
 - BDAC (or its successor)

C. Storage

(Responsible Party: Mark Cowin, 916/653-2986)

- ***Potential Environmental Justice Issues***
 - The greatest potential for environmental justice issues in the CALFED Storage Program is likely related to potential land use changes (e.g. farmland conversion) due to construction of potential storage facilities. These effects are probably most significant in relation to an in-Delta

storage facility, which could involve up to 20,000 acres of Delta island land. Other potential surface storage facilities, including Shasta expansion, Sacramento River off-stream storage, Los Vaqueros expansion, and Upper San Joaquin River storage, would also involve land use changes, but likely less farmland conversion than in-Delta storage. To a lesser extent, groundwater storage and conjunctive use projects could include recharge basins that would also require land use changes.

- There could be environmental justice concerns associated with the operation of groundwater storage and conjunctive use projects and the potential for changes in groundwater flow patterns and movement of groundwater contaminants towards domestic drinking water supply intakes. While one of the CALFED program's principles for implementation of conjunctive use projects is thorough consideration of groundwater quality issues, further consideration of environmental justice issues is appropriate.

- ***Upcoming Milestones and Implementation Actions***

- Develop conjunctive use project solicitation proposal, including evaluation and selection criteria **(date)**
- Review proposals from conjunctive use project solicitation **(date)**
- Select 2001 Prop. 13 conjunctive use projects **(date)**
- Pre-feasibility data collection and study of alternatives on Shasta enlargement **(date)**
- Continue feasibility studies on North of Delta storage (i.e., Sites Reservoir) **(date)**
- Initiate a joint DWR/USBR study of the Delta Wetlands Project **(date)**
- Develop partnerships with local representatives to initiate studies of Los Vaqueros Reservoir enlargement **(date)**
- Develop partnerships with local representatives to initiate studies of Upper San Joaquin surface storage options **(date)**
- Develop partnerships with local representatives to initiate sub-basinwide conjunctive use water management planning processes **(date)**

- ***Process and Forums for Ensuring Effective Participation***

- Conjunctive Use Advisory Team
- Conjunctive Use proposal review teams and selection panel
- BDAC (or its successor)

- Public workshops on Shasta enlargement
- Public workshops on Sites Reservoir
- Regular meetings or regional/local public workshops on groundwater sub-basin planning

D. Conveyance

(Responsible Party: Dennis Majors, 916/657-4765)

- ***Potential Environmental Justice Issues***
 - Loss of employment and/or displacement of minority and low-income workers and residents because of land use changes associated with new or modified conveyance facilities or actions within restoration or flooded island areas
 - Potential water quality impacts associated with anticipated diversions, operational changes, and modified water circulation in the Delta.
- ***Upcoming Milestones and Implementation Actions***
 - Complete environmental documentation for permanent barriers **(date)**
 - Complete environmental documentation for new Clifton Court Forebay intakes **(date)**
 - Complete environmental documentation for new Clifton Court Forebay fish screens **(date)**
 - Begin construction of Tracy Fish Test Facility (April 2001)
 - Continue dredging improvements in the South Delta to safeguard navigation and local diverters not adequately protected by temporary barriers **(date)**
 - Initiate study of fish impacts associated with through-delta facility **(date)**
 - Initiate study of water quality impacts associated with through-delta facility **(date)**
 - Initiate intensive study of Delta Cross Channel operations **(date)**
 - Initiate studies on potential infrastructure improvements in the Eastern San Joaquin Valley (Sierra Nevada) watershed **(date)**
- ***Process and Forums for Ensuring Effective Participation***
 - Review of environmental documentation

- South Delta Improvements Team
- Quarterly public meetings in the South Delta
- North Delta Improvements Team
- Delta Cross Channel Through-Delta Facility (DCCTDF) Team

E. Water Use Efficiency

(Responsible Party: Tom Gohring, 916/653-3790)

- ***Potential Environmental Justice Issues***
 - CALFED's Water Use Efficiency (WUE) program should recognize the linkage between water conservation and water quality improvements and where possible, leverage the potential improvements in both areas through technical and financial incentive programs.
 - The WUE program should address industrial and agricultural water use efficiency to help reduce health hazards associated with industrial chemicals.
 - Funding of certain WUE programs could potentially result in the displacement of farmworkers.
 - The WUE program should work to ensure that low-income and minority communities can participate in and receive benefits from WUE activities.
- ***Upcoming Milestones and Implementation Actions***
 - Issue WUE project solicitation proposal (PSP), including evaluation and selection criteria in January 2001
 - Select 2001 WUE projects in February 2001
 - Refine agricultural quantifiable objectives **(date)**
 - Further develop urban BMP certification process **(date)**
 - Develop more detailed milestones to achieving WUE goals **(date)**
 - Convene expert panel to define "appropriate measurement" **(date)**
 - Develop and implement targeted technical assistance programs **(date)**
 - Form a WUE Public Advisory Committee **(date)**
- ***Process and Forums for Ensuring Effective Participation***
 - Provide concerted outreach to low-income and minority communities and community-based groups in advertising the WUE PSP in January 2001.

- WUE proposal review teams and selection panel
- Proposed WUE Public Review Workshop in January
- WUE Public Advisory Committee (in the meantime, work with WUE program manager to suggest environmental justice representatives on the new WUE Public Advisory Committee)
- BDAC (or its successor)
- Local and Regional technical workshops

F. Water Quality

(Responsible Party: John Andrew, 916/653-9715)

- ***Potential Environmental Justice Issues***
 - It is suggested that CALFED's Drinking Water Quality Program (DWQP) focuses too much on water quality in the Delta, rather than the quality of its tributaries and public health concerns at the tap. Specifically, distribution water quality is a missing component of the DWQP, as is point-of-use exposures.
 - The need exists for better linkage between surface water quality and groundwater quality. Rural and poor communities (often served by small public water systems) throughout California rely primarily upon groundwater for domestic supply.
 - In addition to end-of-pipe treatment, pollution prevention needs to be more of a focus for implementation of the DWQP (for example, efforts to develop incentive-based BMP and Integrated Pest Management programs to prevent contaminant/toxic agricultural drainage).
- ***Upcoming Milestones and Implementation Actions***
 - Complete initial study of Bay Area Blending/Exchange project and identify next steps **(date)**
 - Continue to address agricultural drainage issues associated with Veale Tract and Byron Tract **(date)**
 - Continue studies to improve Delta monitoring of organic carbon **(date)**
 - Construct salinity/selenium pilot plant to treat agricultural drainage **(date)**
 - Identify next steps to build on study of magnitudes and sources of contaminant loads in Delta water **(date)**

- Develop drinking water quality project solicitation proposal, including evaluation and selection criteria **(date)**
 - Review proposals from drinking water quality project solicitation **(date)**
 - Select 2001 drinking water quality projects **(date)**
 - Re-orient the DWQP to focus more on public health, rather than solely water quality. Specific to distribution water quality, consider directing funding for pilot programs to improve this aspect of water quality and study whether constituents of concern in drinking water that are affected by distribution (e.g. DBPs, coliforms, lead) are disproportionately affecting low-income communities. **(date)**
 - At the point-of-use, potentially fund research into the actual exposure of Californians to Delta drinking water (i.e. who really drinks it, who buys bottled water, what are the actual exposures, health risks, and consequences for people who are served Delta water at their taps). **(date)**
 - Work to encourage DHS, in coordination with USEPA, to address existing problems with small, domestic, groundwater systems. To the extent that CALFED actions exacerbate these problems (e.g. via water transfers, water conservation, groundwater banking, potable groundwater recharge with recycled water), fully monitor, analyze, and mitigate impacts. **(date)**
- ***Process and Forums for Ensuring Effective Participation***
 - Delta Drinking Water Council
 - Drinking Water Constituents Work Group (DWCWG)
 - DWQP proposal review teams and selection panel
 - BDAC (or its successor)

G. Water Transfers

(Responsible Party: Richard Hunn, 916/657-2666)

- ***Potential Environmental Justice Issues***
 - Efforts to expedite the approval of water transfers should recognize linkages between the transfer of water to different locations and purposes of use and the associated third-party impacts on affected minority and low-income communities located in the water's historic use area. In addition, efforts to improve water management by creating a water market should ensure that water be maintained as a public good.

- ***Upcoming Milestones and Implementation Actions***
 - Launch the “On Tap” website **(date)**
 - Create Water Transfers Information Clearinghouse **(date)**
 - Draft recommendations to streamline the current DWR, USBR, SWRCB water transaction approval process **(date)**
 - Standardize methodology used to quantify carriage water requirements so that transfer proponents proposing to move water across the Delta can appropriately account for this water assessment. **(date)**
 - Work with the SWRCB Water Transfer Workgroup to evaluate whether or not specific actions will yield transferable water, and then develop a set of recommendations to either proceed with legislation or CALFED agency regulations to increase certainty related to water transfers. **(date)**
 - In the context of CALFED’s Water Transfers program, work to clarify and define “injury” and its application to environmental justice concerns. **(date)**
 - Identify study needs to characterize the significance and magnitude of potential effects that may occur to third-parties and local communities, including minority and low-income groups. **(date)**
- ***Process and Forums for Ensuring Effective Participation***
 - Continue to perform “usability testing” with potential stakeholders
 - SWRCB Water Transfer Workgroup
 - CALFED Water Transfer Streamlining Subcommittee
 - Bay-Delta Modeling Forum technical review team
 - BDAC (or its successor)

H. Levees

(Responsible Party: Rob Cooke, 916/654-4479)

- ***Potential Environmental Justice Issues***
 - While the levee program in the long-term should reduce the duration and extent of agricultural land out of production due to flooding, in the short-term the construction of new or modified setback levee structures will eliminate some active agricultural lands. This could result in a

disproportionate loss of employment and/or displacement of minority and low-income workers.

- ***Upcoming Milestones and Implementation Actions***

- Develop solicitation proposal for refinement of Delta Emergency Management Plan and development of Delta Risk Management Strategy, including evaluation and selection criteria **(date)**
- Review proposals from Delta Risk solicitation **(date)**
- Select 2001 Delta Risk contractor **(date)**
- Develop BMPs for reuse of dredged material **(date)**
- Coordinate with USACE on early development of the Sacramento and San Joaquin River Comprehensive Study **(date)**

- ***Process and Forums for Ensuring Effective Participation***

- Targeted outreach in project areas to ensure local participation of low-income and minority workers who may be adversely affected
- Levees and Habitat Advisory Committee
- Mokelumne-Consumnes Watershed Alliance
- BDAC (or its successor)